

SCHIFFRIN BARROWAY TOPAZ & KESSLER, LLP

Joseph H. Meltzer, Esq.
Gerald D. Wells, III, Esq.
Nick S. Williams, Esq. (NW-5946)
Robert W. Biela, Esq.
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056

- and -

THE SHAPIRO FIRM, LLP

Robert J Shapiro, Esq. (RS-3220)
Jonathan S. Shapiro, Esq. (JS-3068)
500 Fifth Avenue, 14th Floor
New York, NY 10110
Telephone: (212) 391-6464
Facsimile: (212) 719-1616

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MELISSA ENG-HATCHER, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

SPRINT NEXTEL CORPORATION;
SPRINT/UNITED MANAGEMENT
COMPANY; and DOES 1 through 10,
inclusive,

Defendants.

CASE NO. 07-CV-07350(BSJ)(KNF)

**PLAINTIFF'S NOTICE OF
MOTION FOR (1) CONDITIONAL
COLLECTIVE CERTIFICATION;
(2) COURT AUTHORIZED
NOTICE; AND (3) PRODUCTION
OF NAMES AND ADDRESSES
PURSUANT TO 29 U.S.C. § 216(b)**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and the Declaration of Gerald D. Wells, III, and the exhibits thereto, and all prior papers and proceedings herein, on a date to be determined by the Court, Plaintiff Melissa Eng-Hatcher on behalf of herself and all others similarly situated, will move the Court for an Order granting (i) conditional collective certification pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b), (ii) issuance of notice in accordance with *Hoffman-La Roche v. Sperling*, 493 U.S. 165 (1989) to all members of the putative collective class, and (iii) the production to Plaintiff of all names and addresses of members of the collective class.

For the Court's consideration, Plaintiff also attaches:

- 1) A [Proposed] Order;
- 2) [Proposed] Notice of Collective Action; and a
- 3) [Proposed] Consent to Sue form.

Dated: July 11, 2008

Respectfully submitted,

**SCHIFFRIN BARROWAY TOPAZ &
KESSLER, LLP**

By: /s/ Gerald D. Wells, III

Joseph H. Meltzer
Gerald D. Wells, III
Nick S. Williams (NW-5946)
Robert W. Biela
280 King of Prussia Road
Radnor, PA 19087
Telephone: 610-667-7706
Facsimile: 610-667-7056

- and -

THE SHAPIRO FIRM, LLP
Robert J Shapiro, Esq. (RS-3220)
Jonathan S. Shapiro, Esq. (JS-3068)
500 Fifth Avenue, 14th Floor
New York, NY 10110

Telephone: (212) 391-6464
Facsimile: (212) 719-1616

Attorneys for Plaintiff